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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DELTA PILOTS ASSOCIATION, Plaintiff, v. RUSSELL C. MELVIN, Defendant.	Civil Action No.: 1:14-cv-00225-AKH PLAINTIFF DPA'S MEMORANDUM OF LAW FOR LEAVE TO FILE AN EXHIBIT UNDER SEAL
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In support of Plaintiff, the Delta Pilots Association's ("DPA"), motion for leave to file an exhibit under seal, DPA states as follows:

DPA filed and served a motion for partial summary judgment on February 17, 2019. (Dkt. 113). In support of that motion DPA also filed a Declaration by Nicholas Paul Granath that, in ¶ 13, referenced a supporting exhibit, Exhibit No. 10, that was "to be separately filed under seal ..." (Dkt. 119, p. 2). Exhibit No. 10 is an extract from Excel spreadsheet file produced in native format, named "SQSP0003", which was produced by Squarespace Inc. The file was produced in response to a subpoena by DPA. The file, which consists of thousands of rows of computer data, was also marked "confidential."

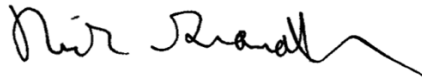
The marking of the file "confidential" was pursuant to a Stipulated Confidentiality Order (Dkt. 47) entered into the docket on this Court's order on May 28, 2015, before Defendant Russell

C. Melvin was named. Under the Stipulated Confidentiality Order information produced by Squarespace that has been marked “confidential” may only be disclosed to the Court and other persons listed therein. (Dkt. 47, at ¶ 3). Before DPA’s motion for partial summary judgment was filed on February 17, 2019, DPA was not able to secure permission from Squarespace to disclose the extract that would be Exhibit No. 10 in a public filing. DPA believes the extract shows important technical data generated from protected computers used by DPA that support its motion for summary judgment.

To bring this evidence before the Court for its timely consideration of DPA’s summary judgment motion, DPA hereby requests permission to file Exhibit No. 10 under seal.

Dated: February 18, 2019
White Plains, NY

SEHAM, SEHAM, MELTZ & PETERSEN, LLP



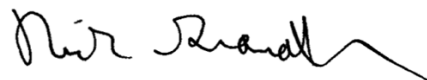
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CERTIFICATE OF SERVICE

I hereby certify that on the date indicated herein above I electronically filed the above, attached document, and I further hereby certify that the above attached document was filed with the Clerk of this Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

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